
United States District Court
District of New Jersey

UNITED STATES OF AMERICA : HON. PATTY SHWARTZ

v. : Magistrate No. 06-3021

ENRICO CALDERON, : **CRIMINAL COMPLAINT**
a/k/a "AMANG"

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. Between at least on or about January 4, 2006, and on or about January 17, 2006, in Essex County, in the District of New Jersey and elsewhere, defendant ENRICO CALDERON, a/k/a "AMANG", did:

SEE ATTACHMENT A

I further state that I am a Senior Special Agent with the United States Department of Homeland Security, Immigration and Customs Enforcement, and that this complaint is based on the following facts:

SEE ATTACHMENT B,

continued on the attached pages and made a part hereof

John Parkin
Senior Special Agent
Department of Homeland Security
Immigration and Customs Enforcement

Sworn to before me and subscribed in my presence,

January 27, 2006 at
Date

Newark, New Jersey
City and State

Honorable Patty Shwartz
United States Magistrate Judge

Signature of Judicial Officer

ATTACHMENT A

knowingly and willfully conspire and agree with Roehl Rivera, who is named as a co-conspirator but not as a defendant herein, and other persons to commit crimes against the United States, that is, to knowingly and in reckless disregard of the fact that an alien had not received prior official authorization to come to, enter, and reside in the United States, bring to the United States, such alien, for the purpose of commercial advantage and private financial gain, contrary to Title 8, United States Code, Section 1324(a)(2)(B)(ii).

OVERT ACTS

In furtherance of this conspiracy and to effect its unlawful object, the following overt acts were committed in the District of New Jersey and elsewhere:

1. On or about January 4, 2006, defendant Enrico CALDERON, a/k/a “Amang” (hereinafter “CALDERON”), traveled from Manila, Philippines to Hong Kong, China with three citizens of the Philippines – identified as D.D., G.S., and H.S. – knowing that these individuals were not eligible to enter the United States.
2. On or about January 4, 2006, in Hong Kong, China, CALDERON arranged for the payment of hotel rooms for D.D., G.S., and H.S.
3. On or about January 4, 2006, in exchange for payment, CALDERON gave altered Country M passports to D.D., G.S., and H.S.
4. On or about January 4, 2006, CALDERON arranged for the payment of airline tickets for Roehl Rivera, G.S., and H.S. to travel on Continental Airlines flight number 98 from Hong Kong to Newark Liberty International Airport in Newark, New Jersey.
5. On or prior to January 4, 2006, CALDERON promised to pay Roehl Rivera between \$300 and \$400 in United States currency to bring D.D., G.S., and H.S. into the United States.
6. On or about January 5, 2006, knowing that D.D., G.S. and H.S. were not otherwise eligible to enter the United States, Roehl Rivera traveled on Continental Airlines flight number 98 from Hong Kong to Newark Liberty International Airport in New Jersey and attempted to bring D.D., G.S., and H.S. into the United States.

In violation of Title 18, United States Code, Section 371.

ATTACHMENT B

I, John Parkin, a Senior Special Agent with the Department of Homeland Security, Immigration and Customs Enforcement having conducted an investigation and spoken with other individuals, have knowledge of the following facts. Any statements attributed to individuals are described in substance and in part.

1. At all times relevant to this Complaint, defendant Enrico Calderon, a/k/a "Amang" (hereinafter "CALDERON"), was employed as a driver at the Embassy of Country M in Washington, D.C.

2. On or about January 5, 2006, in Newark, New Jersey, Roehl Rivera ("Rivera") and three other individuals -- identified as D.D., G.S., and H.S. -- arrived at Newark Liberty International Airport on Continental Airlines flight number 98 from Hong Kong ("Flight 98") and applied for admission into the United States.

3. A routine admissibility inspection revealed that Rivera and D.D., who entered the inspection area with Rivera, each presented altered passports from Country M to Customs and Border Protection ("CBP") Inspectors.

4. It was further determined that G.S. and H.S. also presented altered Country M passports to CBP Inspectors.

5. When questioned by CBP Inspectors, D.D., H.S. and G.S. each stated that they did not have permission to enter the United States and that Rivera was bringing them from Hong Kong into the United States in exchange for money.

6. When questioned by CBP Inspectors, Rivera stated that he knew that D.D., G.S., and H.S. were not entitled to enter the United States, and that he expected CALDERON to pay him between \$300 and \$400 in United States currency for bringing D.D., G.S., and H.S. into the United States. Rivera also stated that he received from CALDERON the altered Country M passport that he presented to CBP Inspectors.

7. D.D. stated that on or about January 4, 2006, a man she knew as "Rico" had flown with her, H.S., and G.S. from the Philippines to Hong Kong, where "Rico" provided a hotel room for her, introduced her to Rivera, and gave her an altered Country M passport. D.D. identified a photograph of CALDERON as the man she knew as "Rico".

8. G.S. and H.S. stated that, in exchange for a total payment of \$10,000 in United States currency to be provided by each, they purchased altered Country M passports from a man they knew as "Amang", who flew with them and D.D. from the Philippines to Hong Kong, provided a hotel room for them, and introduced them to Rivera. H.S. and G.S. each identified a photograph of CALDERON as the man they knew as "Amang".